

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	
Plaintiff,	:	CASE NO. 2:08-CR-155
v.	:	JUDGE SMITH
GEORGE M. RILEY,	:	
Defendant.	:	

**MOTION TO TERMINATE SUPERVISED RELEASE**

Defendant George M. Riley, through undersigned counsel, respectfully moves the Court for an Order granting early termination of his supervised release. The reasons in support of this Motion are set forth in the following Memorandum.

Respectfully submitted,

**/s/ Samuel H. Shamansky**  
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Counsel for Defendant

## **MEMORANDUM**

On January 21, 2009, Defendant pleaded guilty to one count of Making a False Statement on a Bank Loan Application in violation of 18 U.S.C. §§ 1014 and 2, a class B felony. A sentencing hearing was held on June 24, 2009, and the Court ordered that Defendant serve a twenty-four month term of incarceration, concurrent to a prison term imposed by the Licking County Court of Common Pleas. The Court further ordered Defendant to serve a five-year term of supervised release following his period of incarceration. Mr. Riley's term of federal incarceration expired on July 19, 2010, and he was granted release from state custody on April 26, 2011.

Defendant respectfully requests that the Court terminate his supervision pursuant to 18 U.S.C. § 3583(e)(1), which permits such action "at any time after the expiration of one year of supervised release, pursuant to the provisions of the Federal Rules of Criminal Procedure relating to the modification of probation, if it is satisfied that such action is warranted by the conduct of the defendant released and the interest of justice." The Court must also consider the factors set forth in §§ 3553(a)(1), (a)(2)(B), (a)(2)(C), (a)(2)(D), (a)(4), (a)(5), (a)(6), and (a)(7).

Defendant submits that termination of his release at this time is warranted by his conduct, in the interest of justice, and appropriate in consideration of the statutory factors. While on pre-trial release and during his post-incarceration supervision, Mr. Riley has complied with all terms imposed by the Court. Prior to sentencing, he made full restitution to the victim, Commodore Bank. Finally, Counsel for Defendant has spoken with Mr. Riley's probation officer, Charles R. Mosher, who indicated that he is in favor of early release from supervision.

Defendant submits that his term of incarceration and period of supervised release have provided adequate punishment and deterrence. Furthermore, Mr. Riley's behavior following

release demonstrates that he is not a threat to reoffend. Accordingly, he respectfully requests an early termination of his term of supervised release.

Respectfully submitted,

**/s/ Samuel H. Shamansky**  
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Counsel for Defendant

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was filed with the Clerk of Courts for the United States District Court for the Southern District of Ohio using the CM/ECF system, which will send notification of the filing to U.S. Attorney's Office, 303 Marconi Boulevard, Suite 200, Columbus, Ohio 43215 on June 30, 2014.

**/s/ Samuel H. Shamansky**  
SAMUEL H. SHAMANSKY